

AIR POLLUTION CONTROL DISTRICT



March 19, 2018

Sylvia Vanderspek, Branch Chief
Air Quality Planning Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Exceptional Event Demonstrations for May 18, 2015; May 21, 2015 through May 22, 2015 and January 31, 2016 through February 1, 2016

Dear Ms Vanderspek,

The Imperial County Air Pollution Control District (Air District) is requesting the exclusion of ambient air quality data measured as an exceedance of the PM₁₀ National Ambient Air Quality Standard (NAAQS) at the State and Local Air Monitoring Stations (SLAMS) located within Imperial County, California. As required by the Exceptional Events Rule the Air District is submitting to the California Air Resources Board three Exceptional Event (EE) Demonstrations that ambient air quality data in Imperial County was affected by high winds causing an exceedance of the PM₁₀ NAAQS¹.

The three EE Demonstrations, written under the auspices of the 2016 revision to the Exceptional Events Rule, addresses non-technical and required core technical elements.² Based on the interim guidance and the final guidance issued October 3, 2016, the analysis indicates that a natural event occurred on the specified days when elevated winds associated a weather disturbance that passed through southern California and into Imperial County. The regional weather systems brought elevated gusty winds, above 25 mph, across the natural open areas surrounding and within Imperial County. Dust particles from largely natural open desert areas to the west transported by these winds affected air quality and caused an exceedance in Imperial County. Supporting evidence is provided from the National Weather Service indicating the type and intensity of the weather disturbance.

¹ "Treatment of Data Influenced by Exceptional Events: Final Rule", 72 FR 13560, March 22, 2007

² Interim Guidance on the Preparation of Demonstrations in Support of Requests to Exclude Ambient Air Quality Data Affected by High Winds Under the Exceptional Events Rule, United States Environmental Protection Agency, May 2013

The Air District respectfully requests that after your review, you forward copies of the final documentation to the US EPA, Region IX office showing that a natural event did occur which caused an exceedance of the PM₁₀ NAAQS.

In addition to the core required technical elements the Air District fulfilled nontechnical requirements; public notification that a potential event was occurring; notification to the US EPA of the intent to exclude the measured exceedance and documentation that the public comment process was followed.

Publication in the local newspaper of greatest circulation of a "Notice of Availability of the demonstration of the occurrence of an Exceptional Event" provided notice to the public that the Air District requested the exclusion of PM₁₀ monitored data affected by a natural event during the days identified in the subject line. The comment period ended 30 days after publication, which allowed the public sufficient time to submit comments. Evidence of the publication found in Appendix A provides specific dates. Finally, the Air District posted the EE Demonstrations on its website for the requisite 30 days. No public comments were received.

As always, should you have any questions or require any further information, please contact the undersigned at (442) 265-1800

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Dessert". The signature is stylized with a large, sweeping initial "M" and a trailing flourish.

Matt Dessert
Air Pollution Control Officer

CC: Michael Flagg, US EPA (electronic only)